

Figure 4-4-2. General Instructions for Completion of Element Performance Inspections (EPI).

The following general instructions provide explanations and guidance for each section of the Element Performance Inspection data collection tools.

Purpose of this Element (Air Carrier's responsibility):

This defines the intent of the element and the scope of responsibility of the Air Carrier.

Objective (FAA responsibility):

This defines the scope of the inspection in general terms. Any specifics are contained in the Specific Instructions listed on each individual EPI.

Specific Instructions for this EPI:

All EPI must be accomplished by trained and qualified FAA Operations, Airworthiness, or Cabin Safety Aviation Safety Inspectors (ASI) assigned to an Air Transportation Oversight System (ATOS) Certificate Management Team (CMT). Specific instructions may include additional training, background or qualifications that may be helpful in determining inspector assignments for EPI and completing the EPI.

Prior to beginning any planned surveillance, the inspector should read the data collection tool and review the FAA Guidance and Specific Regulatory Requirements (SRR) included in the supplemental information section of the EPI. Specific instructions include additional references, background information, or manuals that should be reviewed, as well as suggestions for specific types of activities.

Related EPI:

A list of related elements is provided primarily for reference and background information. Inspectors should review the data collection tools for related elements. There may be situations when activities for one EPI may be accomplished in conjunction with activities of related EPI.

Tasks to accomplish:

Each data collection tool contains the statement, "To meet this objective, the inspector will accomplish the following tasks (at the inspection location(s) where applicable):" and lists certain tasks that should be completed during the inspection. Each task is made up of various activities. Some common tasks that may be listed on an EPI are:

- 1. Review the FAA Guidance and Specific Regulatory Requirements (SRR) included in the supplemental information section of this EPI.**

Other CFR's, FAA guidance, and specific regulatory requirements are included with each EPI as reference for the inspector. At the time of publication, the guidance material was considered to be current. Subsequent revisions to EPI will incorporate updates to this guidance material. However, revisions will not be generated based solely on out-of-date guidance. Even if it is out of date or superseded, the listed guidance may be useful as a starting point in researching current guidance.

Some of the listed guidance and regulations pertain to certification while some relate directly to surveillance of the element. Other guidance or regulations may be indirectly related. The term “DIRECTLY RELATED” is defined as guidance that relates directly to surveillance under the associated EPI. “INDIRECTLY RELATED” guidance may correlate with surveillance, but is more likely associated with certification.

2. Review the associated SAI, with emphasis on the Controls Attribute section.

A review of the associated SAI data collection tool and the results of any completed SAI provide the inspector with useful information about the air carrier’s systems and can help the inspector to identify areas of potential risk. The controls attribute section of each SAI lists checks and restraints that must be built into the air carrier’s process to help ensure that the desired results are consistently achieved. While most controls are not regulatory, they are an important safety attribute with desirable features that help to reduce risk. The inspector will be asked in a subsequent question if the controls were being followed.

3. Review policies and procedures.

The inspector should review and gain an understanding of the air carrier’s policies and procedures for the element they are inspecting in order to plan their inspection activities. This will usually involve reviewing sections of the appropriate Operations Specifications, manuals, training programs, or other guidance. A subsequent question will ask the inspector if the air carrier followed its policies and procedures.

4. Discuss with the appropriate personnel.

The purpose of an EPI is to determine if the air carrier is following their approved policies and procedures and to confirm that those policies and procedures are achieving the desired result. Data collection tool questions are not designed to be answered by air carrier personnel during discussions. In completing this task, the inspector asks questions to find out if the air carrier’s employee or contractor is following the policies and procedures of the air carrier.

5. Observe and assess the results.

Each element defines a specific program or process of the air carrier that achieves certain results as described in the “purpose” section of the EPI. The inspector must plan to conduct various activities that will assist them in determining if the policies and procedures are being followed and if those policies and procedures are effective. For example: in assessing the results of a “Deicing” EPI, the inspector may perform various activities at different locations. These activities may include inspecting the storage of deicing materials at station facilities, observing deicing in progress on various aircraft from the ramp, watching deicing procedures during cockpit or cabin en route inspections, and visiting the operations center during icing conditions.

6. Review and assess the records.

The inspector needs to understand the air carrier’s system sufficiently to know what records and reports are generated or used during the processes and procedures for the element. A representative sample of these records should be reviewed and assessed for compliance with regulations and the air carrier’s policies. A separate activity record is not

necessarily required for each individual record or report, but should be completed for each group of records or reports at a specific location on the date of observation.

Questions to answer:

Each EPI lists a series of questions for the inspector to answer based on their observations during the various activities. Questions on each activity report are answered in response to what was observed on that single activity. The data collection tools are not designed to be a checklist of questions that are asked directly of air carrier personnel. Based upon the scope of the EPI and complexity of the air carrier's process, inspectors should develop a plan of research, observation, inspection, and evaluation that will result in the gathering of quality data. Typically, the EPI questions will include the following:

1. Were the following performance measures met?

Each EPI lists performance measures that are specific to that element. Performance measures determine if the air carrier's process is achieving the desired results [refer to Purpose of this element (Air Carrier's responsibility)]. Although it's not a prerequisite, performance measures are mostly based on regulatory requirements.

2. Were the policies and procedures followed?

The inspector needs to gain a thorough understanding of the carrier's policies and procedures in order to answer this question. Responses are only for the activity currently being conducted. All policies and procedures will not be observed during each activity. In certain instances question 2 and some parts of question 1 may seem to be repetitive. Each of those questions should still be answered independently of the other. Question 1 is focused on the results of the performance measures that are built into the air carrier's process. Question two is focused on the air carrier's policies and procedures themselves.

3. Were the controls followed?

This question refers to the controls that are itemized in the associated SAI controls attribute section. Controls are checks and restraints that must be built into the air carrier's process to help ensure that the desired results (purpose of the element) are consistently achieved. A review of those controls will help the inspector answer this question. Not all the controls will be observed during each activity.

Master EPI Record: All questions must be answered in order to save the Master EPI to final. To do this multiple inspection activities will typically be accomplished for each EPI. These inspection activities are reported using an individual activity record that has the exact same questions as the Master EPI record. When completing an individual activity for the EPI, the ASI will answer and enter responses only to those questions that can be answered directly from the activity being reported. Each inspector shall conduct as many individual activities as necessary to accurately answer all the questions on the Master EPI. Most master EPI records will be opened and closed in a reasonably short timeframe, typically between 30-60 days.

EPI Activities: EPI usually involve multiple activities over multiple dates and may involve multiple locations (a sufficient number of activities to answer all the questions and perform a thorough, quality inspection). A general rule of thumb is that any time that the common data

field information changes, (date, location, aircraft, etc.) it is a new activity. It is not the intent to have an activity record for every individual record you look at, but may be each set of records at that location on that day. Since an activity is a snapshot of what the operator is doing at that moment, most activities will probably be opened and closed in a single day.

EPI Common Data Fields.

Enter all the information you have available from each activity. At a minimum, every inspection activity should include Activity Start Date, Activity End Date, and Departure Point/Location. If the inspection activity involves an aircraft, the registration number and make, model, and series must be entered. If the activity involves an aircraft flight, then the arrival point, departure point, and flight number must be entered. If the activity includes an en route inspection, the control number from FAA Form 8430-13, Request for Access to Aircraft, must be entered. Specific instructions for conducting each EPI and reporting those activities are found in that data collection tool. Additional guidance for each data field is found in the ATOS Automation User Guide.

Response Definitions:

Since the EPI questions are answered with either a “yes” or “no” and for some EPI questions, a third answer option of “N/A,” it is important to understand the implications of those answers.

YES means that the specific question being asked, for the particular EPI activity being observed, complies with applicable specific regulatory requirements (SRR) and any FAA guidance appropriate to that element. Further, a “yes” indicates that the observed procedures and system safety principles approved/accepted for the air carrier are being followed.

A “yes” answer always indicates a positive response. Great care should be taken when determining if the response is positive. If the inspector indicates a positive answer using a qualifier (e.g. “Yes, but...”) this may indicate that the answer should actually be a “No.” In that case the inspector should re-evaluate his/her answer.

There may be rare circumstances when it is not possible to observe an event listed on the EPI (e.g. boarding of an intoxicated passenger). On those EPI the questions are worded so that “Yes” answer would indicate compliance since the event was not observed. The specific instructions for those EPIs have further details on how to appropriately answer the questions.

“NO” means that on the specific question being asked, for the particular EPI activity being observed, the operator either does not comply with observed specific regulatory requirements (SRR) and applicable FAA guidance for that element, or that the operator’s procedures are not being followed. No can also mean that system safety procedures are weak in the area being evaluated and that the operator’s approved/accepted procedures are inadequate.

Observed non-compliance with regulations should necessitate coordination with the Principal Inspector and may result in an enforcement investigation. It should be noted that an enforcement investigation would not be appropriate when a “No” response identifies weaknesses in a system that has literal compliance with the regulations or in the case where, in the inspector’s opinion, any approved/accepted procedures are inadequate.

NOTE: Significant issues or items of immediate concern, as determined by the inspector, shall be verbally conveyed to the PI in a timely manner. Either an electronic message or memorandum should follow up verbal conveyance.

NOT APPLICABLE (N/A) is only provided as an option for those questions that may not apply to all air carriers. N/A means that a particular question does not apply to the operator being evaluated due to such reasons as type of operation, type of aircraft, or area of operation, etc. N/A does not mean “not observed” or that not enough time was available to answer the question. If a question applies to an operator, then enough observations should be conducted to appropriately answer the question. Since this option is associated only with questions that are not applicable due to the types of operations authorized for the particular air carrier, a simple comment must be entered as to why this was marked N/A (e.g. Air Carrier does not conduct Flag operations).

Comment Fields:

All comments should be written in clear, concise language, using sentence case and proper spelling. Explanations should be complete and descriptive, with as much information as necessary for other CMT members to understand the comments without requiring further information from the inspector. Comments submitted in the ATOS automated tools should include who, what, where, when, why, and how. References may be entered when appropriate.

ASIs should not enter the word “None” in any comment field. If a particular comment field does not apply, just leave it blank. Comment fields should be used to report observed facts, not inspector opinion. Comments that do not directly relate to the question being answered are inappropriate. An important function of the Data Evaluation Program Manager is the review of comment fields to ensure that quality data enters the ATOS database. The DEPM shall return any records for correction that do not meet the ATOS data quality guidelines.